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MEMO ENDORSED

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District Judge Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: 1:20-cv-00496-VEC
Sanders v. Trader Joe's Company

Dear District Judge Caproni:

This office represents the plaintiff. In accordance with your Honor's Individual Practices in Civil Cases, plaintiff, jointly and with consent of defendant, requests an adjournment of the conference and preconference submissions scheduled for Friday, April 24, 2020 and Thursday, April 16, 2020.

The reason for the proposed adjournment is because defendant very recently designated outside counsel, who waived service of process today. Plaintiff filed the waiver, setting defendant's time to answer or respond as June 15, 2020.

The parties have not had the chance to substantively discuss this action, but intend to do so, which will include a motion to dismiss or answer by defendant, an amended complaint by plaintiff, limited informal exchange of relevant information, and a resolution of the issues based on good faith discussions.

There has been one previous request for an adjournment of the conference, which was granted. This request is submitted less than 48 hours prior to the date the preconference submissions are required. In light of the COVID-19 crisis and waiver of service being filed today, the parties propose an alternate date of June 15, 2020 for the conference with the preconference submissions to be filed by June 8, 2020. Thank you.

Application GRANTED. The Court's IPTC Notice warned that "requests for adjournment of the IPTC will not necessarily be granted on the ground that one or more Defendants have not been served or answered prior to the scheduled IPTC." The Court is not amused with the delays in this case. Nonetheless, the Court will adjourn the IPTC. The parties must exchange informal discovery and meet and confer in a good faith attempt to settle part or all of this case before the date their joint letter and proposed Case Management Plan are due, and include an update on those efforts in their joint letter. The Court is happy to refer the parties for a settlement conference with Magistrate Judge Gorenstein upon a joint request at any time.

The IPTC is adjourned to **June 12, 2020, at 10:00 a.m.** and the parties' joint letter and proposed CMP are due no later than **June 4, 2020.**

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

SO ORDERED.


4/15/20

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Certificate of Service

I certify that on April 15, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan